

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
	§	(Jointly Administered)
Post-Effective Date Debtors.¹	§	

**ORDER SUSTAINING PLAN ADMINISTRATOR’S FOURTH OMNIBUS OBJECTION
TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE AND
RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
SEEKING TO DISALLOW CERTAIN CLAIMS**

(AMENDED AND SUPERSEDED CLAIMS)

[Related Docket No. ____]

Upon the *Plan Administrator’s Fourth Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Amended and Superseded Claims)* (the “Objection”)² of the administrator of the chapter 11 plan (the “Plan Administrator”) of the above-captioned reorganized debtors (collectively, the “Debtors,” as applicable, and after the effective date of their plan of

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

reorganization, the “Reorganized Debtors”), seeking entry of an order (this “Order”) disallowing the Amended and Superseded Claims identified on Schedule 1 attached hereto, it is **HEREBY ORDERED THAT:**

1. Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, each Multi-Debtor Claim identified as a “Claim To Be Disallowed” on Schedule 1 to this Order is disallowed in its entirety; *provided* that this Order will not affect the claims identified as a “Remaining Claim” on Schedule 1; *provided further*, that the Plan Administrator reserves the right to object to any Proof of Claim identified as a “Remaining Claim” on Schedule 1 on any applicable grounds.

2. The Debtors’ Claims Agent is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Each claim and the objections by the Plan Administrator to each claim identified in Schedule 1 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Amended and Superseded Claim.

4. Except as otherwise provided in this Order, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity’s estate; (b) a waiver of any party’s right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Plan Administrator’s rights under the Bankruptcy Code or any other applicable law.

5. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

6. The Plan Administrator, the Claims Agent, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

7. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Dated: _____, 2021

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	69	Dynamic Offshore Resources NS, LLC	Creditor: CYPRESS-FAIRBANKS ISD	\$29,413.99	\$0.00	\$0.00	\$0.00	\$29,413.99
	Filed On:	8/20/2020	LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO BOX 3064 HOUSTON, TX 77253-3064					
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	960	Dynamic Offshore Resources NS, LLC	Cypress-Fairbanks ISD	\$32,012.95	\$0.00	\$0.00	\$0.00	\$32,012.95
	Filed On:	4/26/2021	Linebarger Goggan Blair & Sampson, LLP PO Box 3064 Houston, TX 77253-3064					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	224	Fieldwood Energy LLC	Creditor: Department of Treasury - Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	\$0.00	\$0.00	\$10,579,101.82	\$2,799.32	\$10,581,901.14
	Filed On:	10/7/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Claim To Be Disallowed	225	Fieldwood Energy LLC	Creditor: Department of Treasury - Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	\$0.00	\$0.00	\$10,575,651.26	\$2,799.32	\$10,578,450.58
	Filed On:	10/9/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	940	Fieldwood Energy LLC	Department of Treasury - Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	\$0.00	\$0.00	\$0.00	\$2,799.32	\$2,799.32
	Filed On:	2/16/2021						

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	14	Fieldwood Energy LLC	Creditor: Diversified Well Logging, LLC 711 W 10th St Reserve, LA 70084	\$0.00	\$0.00	\$0.00	\$515,180.10	\$515,180.10
	Filed On:	8/7/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	453	Fieldwood Energy LLC	Diversified Well Logging, LLC	\$379,561.40	\$0.00	\$0.00	\$135,618.70	\$515,180.10
	Filed On:	11/20/2020	c/o Dore Rothberg McKay, P.C. 17171 Park Row, Suite 160 Houston, TX 77084					
Claim To Be Disallowed	185	Fieldwood Energy LLC	Creditor: Fleet Supply Warehouse, L.L.C. P. O. Box 9055 Houma, LA 70361	\$0.00	\$0.00	\$0.00	\$52,073.86	\$52,073.86
	Filed On:	9/21/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	471	Fieldwood Energy LLC	Fleet Supply Warehouse, L.L.C.	\$0.00	\$0.00	\$0.00	\$52,820.64	\$52,820.64
	Filed On:	11/23/2020	P. O. Box 9055 Houma, LA 70361					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	71	Dynamic Offshore Resources NS, LLC	Creditor: Harris County et al. John P. DillmanLinebarger Goggan Blair & Sampson LLP PO Box 3064 Houston, TX 77253-3064	\$16,838.97	\$0.00	\$0.00	\$0.00	\$16,838.97
	Filed On:	8/20/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	961	Dynamic Offshore Resources NS, LLC	HARRIS COUNTY, ET AL LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO BOX 3064 HOUSTON, TX 77253-3064	\$18,220.22	\$0.00	\$0.00	\$0.00	\$18,220.22
	Filed On:	4/26/2021						

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	757	Fieldwood Energy LLC	Creditor:					
			Hess Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
Filed On:	11/25/2020		Reed Smith LLP Attn: Omar J Alaniz 2850 N Harwood Street, Suite 1500 Dallas, TX 75201					
Comments:	Claim was amended and superseded by a later filed claim.							
Remaining Claim	943	Fieldwood Energy LLC	Hess Corporation	\$0.00	\$0.00	\$0.00	\$140,807,921.00	\$140,807,921.00
Filed On:	2/24/2021		Reed Smith LLP Attn: Omar J. Alaniz 2850 N. Harwood Street, Suite 1500 Dallas, TX 75201					
Claim To Be Disallowed	761	Fieldwood Energy SP LLC	Creditor:					
			Hess Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
Filed On:	11/25/2020		Reed Smith LLP Attn: Omar J. Alaniz 2850 N. Harwood Street, Suite 1500 Dallas, TX 75201					
Comments:	Claim was amended and superseded by a later filed claim.							
Remaining Claim	944	Fieldwood Energy SP LLC	Hess Corporation	\$0.00	\$0.00	\$0.00	\$140,807,921.00	\$140,807,921.00
Filed On:	2/24/2021		Reed Smith LLP Attn: Omar J. Alaniz 2850 N. Harwood Street, Suite 1500 Dallas, TX 75201					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	30	Fieldwood Energy LLC	Creditor: Hill and Knowlton Strategies LLC Attn: Chris Heim 500 West 5th Street Suite 100 Austin, TX 78701	\$0.00	\$0.00	\$0.00	\$24,000.00	\$24,000.00
	Filed On:	8/12/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	189	Fieldwood Energy LLC	Hill and Knowlton Strategies LLC Attn: Chris Heim 500 West 5th Street Suite 1000 Austin, TX 78701	\$0.00	\$0.00	\$0.00	\$36,000.00	\$36,000.00
	Filed On:	9/25/2020						
Claim To Be Disallowed	298	Fieldwood Energy LLC	Creditor: Infinity Valve & Supply, LLC DeBaillon Law Firm, LLC 111 Concord St., Suite B Abbeville, LA 70510	\$0.00	\$34,039.97	\$0.00	\$26,414.84	\$60,454.81
	Filed On:	10/30/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	977	Fieldwood Energy LLC	Infinity Valve & Supply, L.L.C. Ryan Goudelocke 3936 Bienville Street New Orleans, LA 70119	\$0.00	\$34,039.97	\$0.00	\$26,414.84	\$60,454.81
	Filed On:	6/11/2021						

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	946	Fieldwood Energy LLC	Creditor: Louisiana Department of Revenue P.O. Box 66658 Baton Rouge, LA 70896	\$0.00	\$0.00	\$6,454.05	\$3,088.56	\$9,542.61
	Filed On:	3/2/2021						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	978	Fieldwood Energy LLC	Louisiana Department of Revenue	\$0.00	\$0.00	\$9,542.61	\$0.00	\$9,542.61
	Filed On:	6/15/2021	PO Box 66658 Baton Rouge, LA 70896					
Claim To Be Disallowed	389	Fieldwood Energy LLC	Creditor: MACQUARIE CORPORATE AND ASSET FUNDING INC. John M. Castillo 130 E. Travis, Suite 350 San Antonio, TX 78205	\$0.00	\$0.00	\$0.00	\$17,357,100.07	\$17,357,100.07
	Filed On:	11/16/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	853	Fieldwood Energy LLC	Macquarie Corporate and Asset Funding Inc	\$0.00	\$0.00	\$0.00	\$17,357,100.07	\$17,357,100.07
	Filed On:	12/3/2020	John M. Castillo 130 E. Travis, Suite 350 San Antonio, TX 78205					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	248	Fieldwood Energy LLC	Creditor: Magnum Mud Equipment Co., Inc. Stanwood R. Duval 101 Wilson Avenue Houma, LA 70364	\$0.00	\$0.00	\$0.00	\$138,005.95	\$138,005.95
	Filed On:	10/15/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	665	Fieldwood Energy LLC	Magnum Mud Equipment Co., Inc.	\$83,442.80	\$0.00	\$0.00	\$93,596.67	\$177,039.47
	Filed On:	11/24/2020	Stanwood R. Duval 101 Wilson Avenue Houma, LA 70364					
Claim To Be Disallowed	68	Fieldwood Energy LLC	Creditor: Mississippi Department of Revenue Bankruptcy Section P.O. Box 22808 Jackson, MS 39225-2808	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	Filed On:	8/20/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	882	Fieldwood Energy Inc.	Mississippi Department of Revenue	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	Filed On:	1/8/2021	Bankruptcy Section P.O. Box 22808 Jackson, MS 39225-2808					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	286	Fieldwood Energy LLC	Creditor: Reliable Machine Services Inc. 809 Cajundome Blvd. Lafayette, LA 70506	\$0.00	\$0.00	\$0.00	\$20,876.08	\$20,876.08
	Filed On:	10/26/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	289	Fieldwood Energy LLC	Reliable Machine Services Inc. 809 Cajundome Blvd Lafayette, LA 70506	\$0.00	\$9,261.52	\$0.00	\$11,614.56	\$20,876.08
	Filed On:	10/27/2020						
Claim To Be Disallowed	300	Fieldwood Energy LLC	Creditor: River Rental Tools, Inc. 109 Derrick Road Belle Chasse , LA 70037	\$0.00	\$0.00	\$0.00	\$505,586.68	\$505,586.68
	Filed On:	11/2/2020						
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	949	Fieldwood Energy LLC	River Rental Tools, Inc. Joseph P. Briggett 601 Poydras Street Suite 2775 New Orleans, LA 70130	\$220,115.75	\$0.00	\$0.00	\$285,470.93	\$505,586.68
	Filed On:	3/8/2021						

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	27	Fieldwood Energy LLC	Creditor: Robin Instrument & Specialty, LLC	\$0.00	\$0.00	\$0.00	\$19,777.38	\$19,777.38
	Filed On:	8/13/2020	205 N Luke Lafayette, LA 70506					
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	134	Fieldwood Energy LLC	Robin Instrument & Specialty, LLC	\$0.00	\$0.00	\$0.00	\$19,777.38	\$19,777.38
	Filed On:	9/4/2020	205 N Luke St Lafayette, LA 70506					
Claim To Be Disallowed	565	Fieldwood Energy Offshore LLC	Creditor: Samson Contour Energy E&P, LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	Filed On:	11/23/2020	Attn: Chace Daley 15 East 5th Street Suite 1000 Tulsa, OK 74103					
	Comments:	Claim was amended and superseded by a later filed claim.						
Remaining Claim	954	Fieldwood Energy Offshore LLC	Samson Contour Energy E&P, LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	Filed On:	3/23/2021	Attn: Chace Daley 15 East 5th Street, Suite 1000 Tulsa, OK 74103					

Amended and Superseded Claims

Schedule 1
Amended and Superseded Claims

In re: Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	78	Fieldwood Energy LLC	Creditor: T&B Repairs, Inc PO Box 80308 Lafayette, LA 70598	\$0.00	\$0.00	\$0.00	\$64,365.70	\$64,365.70
Filed On:	8/24/2020							
Comments:	Claim was amended and superseded by a later filed claim.							
Remaining Claim	252	Fieldwood Energy LLC	T&B Repairs, Inc.	\$0.00	\$0.00	\$0.00	\$65,949.38	\$65,949.38
Filed On:	10/16/2020		P.O. Box 80308 Lafayette, LA 70598					
Claims To Be Disallowed Totals			19	\$46,252.96	\$34,039.97	\$21,161,207.13	\$18,732,067.86	\$39,973,567.92